
CHAPTER 33 ISSUE A LETTER OF AUTHORIZATION IN LIEU OF A TYPE RATING

Section 1 Background

1. PTRS Activity Code: 1577

3. OBJECTIVE. This chapter describes how to determine if an applicant is eligible for a Letter of Authorization (LOA) to act as PIC in lieu of a type rating. Completion of this task results in the issuance or denial of an LOA.

5. GENERAL.

A. Aircraft Requiring a Type Rating. Circumstances may arise that require an aircraft to be flown by a pilot who does not hold a type rating for that aircraft. Provided the flight can be completed safely, an operations inspector may issue an LOA under FAR § 61.31(b). This LOA (Figure 33-1) permits a pilot to act as pilot-in-command (PIC) of the aircraft for the proposed flight. For surplus military piston- or turbine-powered aircraft, see Chapter 32, Issue a Letter of Authorization for Pilot-in-Command of Surplus Military Turbine- or Piston-Powered Airplanes.

B. Requirements for Aircraft Undergoing Certification. During the type certification process, it is sometimes necessary for industry pilots or FAA inspectors with airman certification responsibility to be qualified in a particular aircraft before a pilot certificate type rating designator is established for that aircraft. In these circumstances, and at the discretion of the manager of the aircraft evaluation group (AEG), an LOA (Figure 33-2) may be issued in lieu of a type rating. This LOA and Letter of Application (Figure 33-3) must be in the pilot's possession when exercising the authorized privileges. The LOA can eventually be surrendered to a district office in exchange for a temporary airman certificate bearing the category, class, and type ratings.

C. Conducting the Practical Test. If an applicant has applied for an LOA for an aircraft undergoing certification that has not been issued a type designation, and if the appropriate AEG has been contacted, the original inspector is finished with the task. An inspector from the AEG conducts the practical test and issues the LOA.

D. Determining Eligibility. When determining an applicant's eligibility for an LOA in lieu of a type rating, it may be necessary for the inspector and applicant to determine if the operation can be conducted safely or to agree upon special conditions or limitations.

E. Surrender of LOA. When an applicant surrenders an LOA for a type rating, Form 8060-4 must be issued according to the procedures in Chapter 9, Conduct a Pilot Type Rating Certification. The LOA should then be attached to the pilot's certification file.

7. LOA FOR TYPE-RATED AIRMAN REQUIRING PIC PROFICIENCY CHECKS. FAR § 61.31 provides for LOAs for ferry flights, aircraft practical tests, training flights, and pilot practical tests. FAR § 61.58(a) requires that a pilot must have completed a proficiency check to serve as PIC of an aircraft certificated for more than one pilot. FAR § 61.58(f) is an exception to FAR § 61.58(a), and permits a pilot to act as PIC to meet the 12-month or 24-month proficiency checks.

A. Pilots-in-Command Unavailable. Problems have surfaced when an aircraft needed to be ferried or moved, but the type rated pilot did not meet FAR § 61.58. Quite often the aircraft involved is one for which type-rated and current pilots are not immediately available, if at all, to serve as PIC to ferry the aircraft to a point where required maintenance or a proficiency flight check can be properly accomplished.

B. Regulatory Provisions. FAR § 61.58(f) permits a pilot to serve as PIC of a large aircraft certificated for more than one pilot for the purpose of meeting proficiency check requirements of FAR § 61.58(a) provided that no passengers or property are carried and the flight is conducted in VFR or day IFR conditions.

C. Incidental Flight. Broadly interpreted, FAR § 61.58(f) provides for incidental flying within VFR/IFR limitations to meet FAR § 61.58(a)

proficiency requirements. This flying may include ferrying the aircraft to a suitable location for the practical test. It could also include a test flight of the aircraft following maintenance to prepare the aircraft for a pilot proficiency check. This incidental flying may also involve ferrying the aircraft to a location for maintenance if the ultimate objective is a pilot proficiency check.

D. Issuance of Authorization. An LOA may be

issued if the pilot's primary objective is meeting the proficiency requirements of FAR § 61.58(a). All authorizations involving incidental flying shall be in writing, clearly stating this objective, and stating what incidental flying is authorized. Incidental flying (ferrying, practical test of aircraft, etc.) does not include the proficiency check itself. An LOA is not necessary, and will not be issued, if only the proficiency check is involved; FAR § 61.58(f) permits a pilot to serve as PIC for the proficiency check.

Section 2 Procedures

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites. This task requires knowledge of FAR Part 61 requirements, FAA policies, and qualification as an Aviation Safety Inspector (Operations).

B. Coordination. This task may require coordination with an aircraft evaluation group (AEG).

3. REFERENCES, FORMS, AND JOB AID.

A. References.

- FAR Parts 1 and 91
- Order 8700.1, General Aviation Operations Inspector's Handbook
- PTRS Field Office Manual

B. Forms.

- FAA Form 8000-36, PTRS Transmittal Form
- FAA Form 8710-1, Application for Airman Certificate or Rating

C. Job Aids.

- Sample letters and figures

5. PROCEDURES FOR AIRCRAFT REQUIRING A TYPE RATING.

A. Application. Advise the applicant that a written request should be submitted at least 30 days before the first intended operation. The written request must include the following information:

(1) The applicant's name, address, and daytime telephone number.

(2) A copy of the applicant's pilot certificate, or a listing of the data from the certificate.

(3) A description of the pilot's background, including total flight time, and flight time in the type of airplane involved or similar type, if any.

(4) The date and class of airman medical certificate and any limitations.

(5) The make and model of the aircraft to be flown.

(6) A description of the proposed operations, including the dates.

B. PTRS. Open PTRS file.

C. Eligibility.

(1) Upon receipt of the written application and FAA Form 8710-1, determine the reason for the applicant's request:

(a) Practice in a single-control aircraft to qualify for a type rating (for a period not to exceed 60 days).

(b) A ferry flight by a pilot who does not normally fly the type of aircraft concerned (for a period not to exceed 60 days).

(c) A test flight in an aircraft repaired or modified by an approved repair station or manufacturer (for a period not to exceed 60 days).

(d) A practice or training flight ("buddy" or solo) in a formal training course which leads to qualification for type rating (for a period not to exceed 60 days).

(e) Any flights for which it is not practical or reasonable to require the pilot to obtain a type rating (in such a case, the supervising inspector must consider the flights safe under existing circumstances).

(2) Verify the applicant's identity by inspecting an acceptable form of identification. (See Chapter 1, Section 4, paragraph 5.)

(a) Compare the identification with the personal information provided on FAA Form 8710-1.

(i) If the applicant's identity can be verified, review the application letter.

(ii) If the applicant's identity cannot be verified because of lack of identification or inadequate identification, explain what types of identification

are acceptable. Instruct the applicant to return with appropriate identification to re-apply.

(b) If the applicant's identity appears to be different from the information on FAA Form 8710-1, or it appears that an attempt at falsification has been made, do not continue with this task. See Chapter 182, Conduct an Investigation to Determine Compliance.

(3) Review the letter of application for the required content.

(a) If the application letter is complete and accurate, review FAA Form 8710-1.

(b) If the application letter is not complete, indicate the areas that need correction. Provide a suspense date to the applicant for correction.

(4) Review FAA Form 8710-1 for the following:

(a) In Section I ensure that the applicant has marked the appropriate box for grade of certificate, has marked the "Other" box, and has written "Surplus Military LOA" in the blank.

(b) Ensure that the applicant has filled out all of Section I A through U.

(c) Ensure that the applicant has filled out the appropriate portion of Section II.

(d) Ensure that the applicant has filled out the relevant portions of Section III; however, the applicant may elaborate on flight time in the application letter.

(e) Ensure that the applicant has checked "yes" or "no" in Section IV.

(f) Ensure that the applicant has signed and dated the application form.

(g) An instructor recommendation (reverse side of FAA Form 8710-1) is not required.

(5) If the FAA Form 8710-1 is complete and accurate, determine if the applicant is eligible for an LOA.

(6) If the FAA Form 8710-1 is not complete, indicate the areas that need correction. Provide a

suspense date to the applicant for correction.

D. Applicant Eligible. If the applicant meets the requirements for an LOA, proceed as follows.

(1) Prepare the LOA for the district office manager to sign, using the sample letter (Figure 33-1). The letter must include:

(a) The pilot's name.

(b) The N-number of the aircraft.

(c) The flight authorized (including any special conditions or limitations).

(d) The expiration date of the letter.

(2) Obtain the district office manager's signature.

(3) Issue the LOA and a copy of the application to the applicant.

E. Applicant Not Eligible.

(1) If the applicant is not eligible for the LOA, inform the applicant in writing of the reasons for the denial.

(2) On FAA Form 8710-1, Inspector's Report portion --

(a) Check the "Approved" box and strike out the words "Temporary Certificate Issued."

(b) Indicate the location and duration of the test (flight and ground).

(c) Under "Certificate or Rating for Which Tested," enter "Surplus Military LOA."

(d) Indicate the type of aircraft and its registration number.

(e) Enter the date of the test, sign the report, and indicate the FSDO's acronym.

(f) In the "Attachments" section, check ONLY the box marked, "Airman's Identification." Indicate what was used to verify the applicant's identity.

F. File

the LOA and the request. If the request is disapproved, note the reasons for the disapproval on the request and file the request.

(2) On FAA Form 8710-1, Inspector's Report portion --

(a) Check the "Disapproved" box and strike out the words "Disapproval Notice Issued."

(b) Indicate the location and duration of the test (flight and ground).

(c) Under "Certificate or Rating for Which Tested," enter "Surplus Military LOA."

(d) Indicate the type of aircraft and its registration number.

(e) Enter the date of the test, sign the report, and indicate the FSDO's acronym.

(f) In the "Attachments" section, check ONLY the box marked, "Airman's Identification." Indicate what was used to verify the applicant's identity.

G. PTRS. Complete FAA Form 8000-36 in accordance with the PTRS field office manual.

7. PROCEDURES FOR AIRCRAFT UNDERGOING CERTIFICATION.

A. Initial Request. If an applicant requests an LOA for an aircraft that is undergoing certification and has not been issued a type designation, proceed as follows.

(1) Contact the appropriate AEG:

(a) Small airplanes - FAR Part 23, Central Region

(b) Transport airplanes - FAR Part 25, Northwest Mountain Region

(c) Rotorcraft - FAR Parts 27 and 29, Southwest Region

(2) Coordinate with the AEG concerning the requirements for a practical test. Determine who can conduct the test.

(3) Have the person conducting the test contact the applicant and arrange an appointment for the practical test and the issuance of the LOA.

B. PTRS. Open PTRS file.

C. Practical Test. Conduct the practical test in accordance with Chapter 9, Conduct a Pilot Type Rating Certification. If the applicant satisfactorily completes the practical test, prepare an LOA instead of a Temporary Airman Certificate.

D. Issuance of an LOA.

(1) Prepare the LOA using the example in Figure 33-2 as a guide.

(2) Be sure to include the applicant's name and address, the aircraft's manufacturer and model designation, and the date of the practical test.

(3) Give the applicant the original copy of the letter. Inform the applicant that the privileges authorized will expire 60 days from the date of issuance or when surrendered in exchange for the appropriate type rating, whichever occurs first.

E. File. File a copy of the LOA along with the letter of application. These should be kept for at least 30 days after the expiration date.

F. PTRS. Complete FAA Form 8000-36 in accordance with PTRS field office manual.

9. TASK OUTCOMES. Completion of this task results in either:

A. Issuance of an LOA.

B. Denial of an LOA.

11. FUTURE ACTIVITIES

A. Applicant may surrender LOA for a type rating.

B. Enforcement investigation if the holder of the LOA does not operate within its limitations.

C. Issuance of a Temporary Airman Certificate when a type rating designation is assigned.

FIGURE 33-1 SAMPLE LETTER OF AUTHORIZATION

FAA Letterhead

August 15, 1989

Mr. John Rochester Doe
1234 Sixth Avenue
Midtown, Arkansas 98765

Dear Mr. Doe:

This letter authorizes you to serve as pilot-in-command on solo practice flights in Grumman TBF, N 6789G.

Flights made under this authorization shall be limited to VFR day flights within a 25-mile radius of Midtown Airport. No person other than the pilot shall be carried.

This authorization expires upon your successful completion of the tests for a TBF type rating, but in no case later than October 15, 1989.

Sincerely,

WILLIAM X. JONES, Manager
Flight Standards District Office
Little Rock, Arkansas

FIGURE 33-2 SAMPLE LETTER OF AUTHORIZATION IN LIEU OF A TYPE RATING

FAA Letterhead

Mr. Daniel M. Williams
3600 Northwest Avenue
Washington, D. C. 20022

Dear Mr. Williams:

This is to certify that on ____ (Date) ____ you satisfactorily completed the practical test prescribed by FAR Section(s) _____. The flight test was satisfactorily completed in the following aircraft:

Manufacturer	Model Designation
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Carriage of passengers or cargo for hire, or similar means of revenue-generating flight operations, are prohibited. (This limitation is appropriate only while holder uses letter in lieu of appropriate category, class, and type rating.)

You may present this letter, a completed FAA Form 8710-1 and your current airman certificate to the nearest Flight Standards District Office, whereupon you may be issued an FAA Form 8060-4, Temporary Airman Certificate, with appropriate category, class, and type rating.

This Letter of Authorization must be carried in the personal possession of the pilot when exercising the privileges authorized and will expire 60 days from the date of issuance or upon being surrendered in exchange for the appropriate type rating, whichever occurs first.

(Appropriate Authorizing Signature)

FIGURE 33-3 LETTER OF APPLICATION JOB AID

.Items to be covered in Letter of Application:

- Applicant's name, address, and telephone number
- Applicant's grade of pilot certificate; certificate number; category, class, and type ratings; and limitations
- Description of the pilot's aviation background
 - Total time
 - Time in type or similar type
- Date and class of medical certificate, including any limitations
- Make and model of aircraft to be flown
- Description of proposed operations, including the dates.